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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRANÇOIS MARLAND,

Plaintiff,

- against -

**MATTHEW HEYSEL, and
BIG SKY ENERGY CORPORATION,**

Defendants.

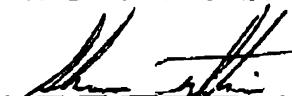
**Case No. 08 CIV 3751
(LAK)(DCF)**

**STIPULATION AND
PROPOSED ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between counsel to the parties in the above titled action, that within which Plaintiff François Marland must serve reply papers to Defendants' Notice of Motion to Dismiss, is extended to and including July 9th, 2008, and that Defendants shall serve any reply papers by July 17th, 2008.

Dated: New York, New York
July 2, 2008

HAYES & MALONEY LLP



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[Order on Following Page]

JUL 02 2008 16:13 FR PROSKAUER ROSE LLP 192 969 2935 TO *4398*93504001*7 P.03

SO ORDERED this day of _____ day of _____, 2008.

THE HON. LEWIS A. KAPLAN